

UNITED STATES DISTRICT COURT FOR
THE SOUTHERN DISTRICT OF NEW YORK

Jean-Marc Zimmerman (JZ 7743)
Zimmerman, Levi & Korsinsky, LLP
226 St. Paul Street
Westfield, NJ 07090
Tel: (908) 654-8000
Fax: (908) 654-7207

Attorneys for Plaintiff Millennium, L.P.

MILLENNIUM, L.P.,

Plaintiff,

v.

VIGNETTE CORPORATION,

Defendant.

Case No. 07 CV 4800 (BSJ)

REPLY TO COUNTERCLAIMS

Plaintiff, Millennium, L.P. ("Millennium") by its attorneys, Zimmerman & Levi, LLP, as
and for its Reply to the Counterclaims of Defendant Vignette Corporation ("Defendants ") replies as
follows:

1. Millennium admits the allegations contained in paragraph 1 of the Counterclaims.
2. Millennium admits the allegations contained in paragraph 2 of the Counterclaims.
3. Millennium admits the allegations contained in paragraph 3 of the Counterclaims.
4. Millennium admits that in paragraph 4 of the Counterclaims, Defendant re-alleges
and incorporates by reference paragraphs 1 through 3 of the Counterclaims.
5. Millennium admits the allegations contained in paragraph 5 of the Counterclaims.
6. Millennium admits that in paragraph 6 of the Counterclaims, Defendant requests a
declaration that it does not infringe any claim of the Asserted Patents, either directly or indirectly,.
7. Millennium admits that in paragraph 7 of the Counterclaims, Defendant re-alleges
and incorporates by reference paragraphs 1 through 6 of the Counterclaims.

1 8. Millennium admits the allegations contained in paragraph 8 of the Counterclaims.

2 9. Millennium admits that in paragraph 9 of the Counterclaims, Defendant requests a
3 declaration that the asserted patents are invalid.

4 **WHEREFORE**, Plaintiff Millennium prays that this Court:

5 A. Dismiss Defendant's Counterclaims with prejudice;

6 B. Deny Defendant all relief prayed for in the Counterclaims;

7 C. Declare that the Asserted Patents and their claims are valid and enforceable;

8 D. Declare that the Asserted Patents and their claims are infringed by the Defendant;

9 E. Enter a final judgment on the Counterclaims, resolving the issues in favor of
10 Plaintiff; and

11 F. Direct such other and further relief as the Court may deem just and proper.

12 By: /s/Jean-Marc Zimmerman

13 Jean-Marc Zimmerman (JZ 7743)
14 Zimmerman, Levi & Korsinsky, LLP
15 226 St. Paul Street
16 Westfield, NJ 07090
Attorneys for Plaintiff Millennium, L.P.

17 Dated: July 11, 2007
18 Westfield, NJ

19 **CERTIFICATE OF SERVICE**

20 I, Jean-Marc Zimmerman, hereby certify that on July 11, 2007, I filed Plaintiff Millennium,
21 L.P.'s Reply to Defendant Vignette Corporation's Counterclaims with the Clerk, Federal District
22 Court for the Southern District of New York, 500 Pearl Street, New York, NY 10007 and served the
same on Defendants' counsel by delivering the same by First Class Mail to:

23 Jessica Margolis, Esq.
24 Wilson Sonsini Goodrich & Rosati, P.C.
25 1301 Avenue of the Americas, 40th Floor
26 New York, NY 10019-6022

27 /s/Jean-Marc Zimmerman